

ANTI-CORRUPTION POLICY

MJ Industrial Energy reaffirms its commitment to integrity, transparency and compliance with the law by adopting a robust policy to combat corruption and unlawful practices across all its activities.

1. Purpose

To establish principles and guidelines for preventing, detecting and responding to corruption, bribery, fraud and other unlawful acts that may compromise the reputation and integrity of **MJ Industrial Energy**.

2. Scope of application

This policy applies in full to all personnel, directors, managers, suppliers, subcontractors, business partners and any third parties acting on behalf of or in the interests of **MJ Industrial Energy**.

3. Fundamental principles

MJ Industrial Energy conducts its activities according to the following principles:

- Zero tolerance for corruption and bribery, whether direct or indirect.
- Compliance with national and international anti-corruption legislation, including Angola's Law No. 3/10, the Foreign Corrupt Practices Act (FCPA) and the UK Bribery Act.
- Rejection of any unlawful payment made to obtain commercial or administrative advantages.
- Transparency in dealings with public and private entities.
- Strict control over donations, sponsorships, gifts, hospitality and other benefits.
- Mandatory reporting of any suspected or unlawful conduct.

4. Prohibited conduct

The following conduct is prohibited:

- Offering, promising or providing improper benefits to public or private officials.
- Soliciting or accepting improper benefits that could influence decisions.
- Making facilitation payments or bribes, even where the amount is small.
- Using intermediaries to conceal acts of corruption.
- Manipulating records or reports to conceal unlawful practices.



5. Internal procedures and controls

The organisation will implement the following procedures and controls:

- Integrity risk assessments for suppliers and partners.
- Due diligence and the inclusion of anti-corruption clauses in all relevant contracts.
- Mandatory recording of all payments, donations and benefits provided.
- Formal approval of gifts and hospitality above the defined thresholds.
- Periodic internal audits of integrity and compliance practices.

6. Speak-up and reporting channel

MJ Industrial Energy will provide a secure and confidential channel for reporting suspected misconduct. Reports may be made anonymously and will be handled in strict confidence, without retaliation.

To be completed: Following internal validation, insert the official email address or other contact details for **MJ Industrial Energy's** reporting channel.

7. Training and awareness

All personnel must receive periodic training on integrity, ethics and corruption prevention, with completion documented and recorded in their individual training records.

8. Consequences of non-compliance

Breaches of this policy will be treated seriously and may result in disciplinary measures, including dismissal for just cause, termination of contract, notification to the authorities and any applicable legal sanctions.

9. Management commitment

The Executive Management of **MJ Industrial Energy** assumes direct leadership and responsibility for the implementation, maintenance and continual improvement of this policy.



10. Review and update

This policy will be reviewed annually or whenever warranted by legal, regulatory or strategic changes.

Cabinda, 7 September 2026

General Director



Operations Director



